

WILKINSON ) BARKER ) KNAUER ) LLP

1800 M STREET, NW  
SUITE 800N  
WASHINGTON, DC 20036  
TEL 202.783.4141  
FAX 202.783.5851  
WWW.WBKLAU.COM  
MELISSA L. TURCIOS  
202.383.3411  
MTURCIOS@WBKLAU.COM

August 8, 2017

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment, WC Docket No. 16-143; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593*  
*Acknowledgement of Confidentiality*

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Data Collection Protective Order*<sup>1</sup> adopted in the above-referenced proceedings, attached is an Acknowledgment of Confidentiality executed by Melissa Turcios of Wilkinson Barker Knauer, LLP, outside counsel for CenturyLink. Also attached are Acknowledgements of Confidentiality pursuant to the *Modified Protective Order*<sup>2</sup> and the *Second Protective Order*.<sup>3</sup> These Acknowledgments are submitted in order to access Confidential and Highly Confidential Information submitted in the above-captioned dockets, for use during the review of the Commission's *BDS Report and Order*.<sup>4</sup>

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<sup>1</sup> *Business Data Services in an Internet Protocol Environment*, Order, 31 FCC Rcd 7104 (WCB 2016); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014).

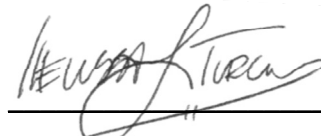
<sup>2</sup> *Special Access for Price Cap Local Exchange Carrier; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010).

<sup>3</sup> *Special Access for Price Cap Local Exchange Carrier; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Second Protective Order, 25 FCC Rcd 17725 (WCB 2010).

<sup>4</sup> *Business Data Services in an Internet Protocol Environment; Technology Transitions; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Report and Order, WC Docket Nos. 16-143 and 05-25, GN Docket No. 13-5, RM-10593, FCC 17-43 (rel. Apr. 28, 2017).

Please contact the undersigned at (202) 383-3411 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Melissa L. Turcios", written over a horizontal line.

Melissa L. Turcios

*Counsel for CenturyLink, Inc.*

cc: specialaccess@fcc.gov (*via e-mail*)  
All Parties on attached Certificate of Service

Enclosures

## APPENDIX A

## Acknowledgment of Confidentiality

WC Docket No. 05-25, RM-10593

I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Second Protective Order. I acknowledge that a violation of the Second Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the Second Protective Order is due solely to my capacity as Outside Counsel or Outside Counsel of Record or Outside Consultant to a party or other person described in paragraph 9 of the foregoing Second Protective Order and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Second Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Second Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Second Protective Order, and I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Second Protective Order.

Executed at Washington, DC this 8th day of August, 2017.

  
[Name] Melissa L. Turcios  
[Position] Associate  
[Address] Wilkinson Barker Knauer LLP  
[Telephone] 202-383-3411

## APPENDIX A

## Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceedings, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order.

I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents or Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed at Washington, DC this 8th day of August, 2017.

  
[Name] Melissa L. Turcios  
[Position] Associate  
[Address] Wilkinson Barker Knauer LLP  
[Telephone] 202-383-3411

## APPENDIX C

## Acknowledgment of Confidentiality

WC Docket No. 05-25; RM-10593

I am seeking access to ☐ only Confidential Information or ☒ Confidential and Highly Confidential Information.

I hereby acknowledge that I have received and read a copy of the foregoing Data Collection Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Data Collection Protective Order and that I shall not disclose or use Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, or Highly Confidential Information except as allowed by the Data Collection Protective Order.

I acknowledge that a violation of the Data Collection Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Data Collection Protective Order, including but not limited to suspension or disbarment of Counsel or Outside Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Data Collection Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Data Collection Protective Order.

I certify that I am not involved in Competitive Decision-Making.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Data Collection Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as a person described in paragraph 9 of the Data Collection Protective Order and agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Data Collection Protective Order and to ensure that there is no disclosure of Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, and Highly Confidential Information in my possession or in the possession of those who work for me, except as provided in the Data Collection Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Data Collection Protective Order.

Executed this 8th day of August, 2017.

  
[Name] Melissa L. Turcios  
[Position] Associate  
[Firm] Wilkinson Barker Knauer LLP  
[Telephone] 202-383-3411

## CERTIFICATE OF SERVICE

I, Melissa L. Turcios, hereby certify that on August 8, 2017, I electronically filed and caused true and correct copies of the foregoing letter and attached Acknowledgments of Confidentiality to be served on the following via electronic mail:

Marvin Sacks  
Pricing Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
Email: Marvin.sacks@fcc.gov

Matthew R. Friedman  
1330 Connecticut Avenue, NW  
Washington, DC 20036  
Email: mfriedman@steptoe.com  
*Counsel to BT Americas, Inc., Granite Telecommunications, LLC, and INCOMPAS*

Evan T. Leo  
Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.  
1615 M Street NW, Suite 400  
Washington, DC 20036  
Email: eleo@khhte.com  
*Counsel to Verizon and Verizon Wireless*

Michael H. Pryor  
Cooley LLP  
1299 Pennsylvania Ave. NW Suite 700  
Washington, DC 20004  
Email: mpryor@cooley.com  
*Counsel to Cox Communications, Inc. and National Cable & Telecommunications Association*

Joseph Kahl Sr.  
Director, Regulatory and External Affairs  
RCN Telecom Services, LLC  
650 College Road East Suite 3100  
Princeton, NJ 08540  
Email: joseph.kahl@rcn.net

Suzanne K. Toller  
Davis Wright Tremaine LLP  
505 Montgomery Street  
San Francisco, CA 94111  
Email: suzannetoller@dwt.com  
*Counsel to T-Mobile USA, Inc.*

Peter M. Connolly  
Holland & Knight  
800 17th Street NW  
Washington, DC 20006  
Email: peter.connolly@hklaw.com  
*Counsel to United States Cellular Corp.*

Alexander L. Stout  
Latham and Watkins LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004  
Email: alexander.stout@lw.com  
*Counsel for Comcast Corporation and Time Warner Cable Inc.*

John T. Nakahata  
Jennifer P. Bagg  
Harris, Wiltshire & Grannis, LLP  
1919 M Street NW, 8th Floor  
Washington, DC 20036  
Email: jnakahata@hwglaw.com  
*Counsel to Windstream Services, LLC and Sprint Corporation*

Jonathan E. Nuechterlein  
Sidley Austin LLP  
1501 K Street NW  
Washington, DC 20005  
Email: jnuechterlein@sidley.com  
*Counsel to AT&T Inc.*

Karen Brinkmann, PLLC  
2300 N Street, NW Suite 700  
Washington, DC 20037  
Email: kb@karenbrinkmann.com  
*Outside Counsel for FairPoint  
Communications, Inc.*

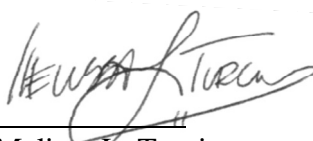
Tamar E. Finn  
Russell M. Blau  
Morgan Lewis LLP  
1111 Pennsylvania Ave. NW  
Washington, DC 20004  
Email: tamar.finn@morganlewis.com  
*Counsel to U.S. TelePacific Corp., Birch  
Communications, Inc., MegaPath Corp.,  
TDS Metrocom, LLC, 360 Networks, LTS  
Buyer LLC, Lighttower Fiber Networks,  
Lumos Networks, and The Wholesale Voice  
Line Coalition*

Colleen Boothby  
Levine, Blaszak, Block & Boothby, LLP  
2001 L Street, N.W. Suite 900  
Washington, DC 20036  
Email: cboothby@lb3law.com  
*Counsel for Ad Hoc Telecommunications  
Users Committee*

Thomas W. Cohen  
Kelley Drye & Warren LLP  
3050 K Street NW, Suite 400  
Washington, DC 20007  
Email: tcohen@kelleydrye.com  
*Counsel to XO Communications, LLC, and  
Covad Communications Group, Inc.*

Thomas Jones  
Willkie Farr & Gallagher LP  
1875 K Street NW  
Washington, DC 20006  
Email: tjones@willkie.com  
*Counsel to EarthLink, Inc., Integra Telecom,  
Inc., tw telecom Inc., and Level 3  
Communications, LLC*

By:



Melissa L. Turcios  
Wilkinson Barker Knauer, LLP  
1800 M Street, NW  
Suite 800N  
Washington, DC 20036  
202-383-3411  
mturcios@wbklaw.com

*Counsel for CenturyLink, Inc.*

DATED: August 8, 2017